



**Coordinating Committee  
San Francisco Bay Area  
Integrated Regional Water Management Plan**  
c/o San Francisco Public Utilities Commission  
525 Golden Gate Avenue  
San Francisco, CA 94102

October 4, 2013

Mr. Theodore Daum  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236

Dear Mr. Daum:

On behalf of the San Francisco Bay Area Integrated Regional Water Management Plan Coordinating Committee, I would like to thank you and the Department of Water Resources for releasing and seeking stakeholder comments on the Draft Plan Review Process (PRP), an addendum to the 2012 IRWM Program Guidelines. We have studied the PRP and believe that the basic framework provides a fair and accurate process to assess consistency between IRWM plans and plan standards.

We do have a few comments and suggestions for modifying the proposed PRP. These comments are provided in detail below.

**Plan Standard: Plan Performance and Monitoring**

The draft *Plan Standards Review Tool* element of the PRP includes two required components for the Plan Performance and Monitoring standard. The first component is that the Plan "Contain performance measures and monitoring methods to ensure that IRWM objectives are met." The second component is to "Describe a method for evaluating and monitoring the RWMG's ability to meet the objectives and implement projects." As currently worded, this second component is confusing and unclear, as it implies that the RWMG is to self-evaluate their ability to oversee the Plan and the implementation of projects, however since the RWMG is not directly implementing projects, this component is unclear. We suggest that, since the first component focuses on IRWM objectives, the second component should focus on projects and the RWMG's ability to oversee their implementation.

We propose that the wording for the second component be changed to: "Describe a method for how the RWMG will oversee and evaluate implementation of projects."

## Plan Standard: Finance

The draft *Plan Standards Review Tool* includes five required components for the Finance standard, which taken together require inclusion of a plan for financing Plan projects and programs, identifying funding sources, funding mechanisms, and addressing certainty of future operation and maintenance funding.

These Finance standard components are problematic as currently worded as they do not specify the level at which these aspects of Finance must be addressed, and seem to imply a level of specificity at the project level that contradicts the intent of creating an open and inclusive process which encourages stakeholders to develop projects that address the Plan objectives. As currently phrased, the components could be interpreted to mean anything from a general, broad discussion of available options, to a very granular, project by project level of detail. Our perspective is that the latter interpretation would be impractical and inconsistent with the goals of IRWM Planning, as meeting this threshold would allow only a very small number of Plan projects, all of which would be at a fully developed level.

We suggest adding language clarifying that what is sought in meeting the Finance standard is a general discussion of potential funding options for projects and programs included in the Plan. This could be accomplished by changing the first component to: "Include a general plan for implementation and financing of projects and programs including the following:"

## Review Process

The PRP describes a review process wherein each submitted IRWMP will be reviewed by two DWR technical reviewers using the *Plan Standards Review Tool*. This approach should ensure an effective process with objective results. However, given the size and complexity of some IRWMPs, such as the Bay Area IRWMP, it may be very time consuming for technical reviewers to locate pertinent text supporting each required component within the Plan, particularly given that aspects of some components may be integrated and referenced throughout the Plan (e.g. climate change, stakeholder involvement, etc.)

We suggest providing the option for RWMGs to include with the IRWMP submittal a table citing IRWMP section and page numbers for each *Plan Standards Review Tool* component, similar to the process utilized in Urban Water Management Plan review. This could be done by adding a bullet under "IV - What to Submit" such as, "Plan Standards Review Tool list of component locations (optional)."

Thank you again for the opportunity to provide comments on the Draft Plan Review Process. We look forward to working with you in your review of the Bay Area IRWMP.

Sincerely,



Steven R. Ritchie  
Chairman, Bay Area IRWMP Coordinating Committee

cc: Norma J. Camacho